



STATE OF DELAWARE
DEPARTMENT OF NATURAL RESOURCES
AND ENVIRONMENTAL CONTROL
DIVISION OF AIR AND WASTE MANAGEMENT
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WASTE MANAGEMENT SECTION

TELEPHONE (302) 323-4540

March 4, 1994

Mr. Andrew Sochanski (3HW42)
U.S. EPA Region III
841 Chestnut Building
Philadelphia, PA 19107

Re: Revised Work Plan of the Remedial Investigation/Feasibility Study
(Version of January 31, 1994) and Field Sampling Plan
Koppers Company, Inc., Newport, Delaware

Dear Mr. Sochanski:

Per your request, the above referenced report has been reviewed. We find the RWP has improved, yet, offer the following comments:

1. Revised Work Plan

- A. It would be nice to recognize DNREC's contributions to the development of this Work Plan. For example, on page 4-21 of RWP, only EPA, Beazer and DuPont, and WCC have been mentioned "...contributions... in the development of a comprehensive sampling strategy for aquatic habitats...".
- B. I strongly recommended the following issues as I pointed out in my letter of August 4, 1993. Here, I would like to copy those comments from that letter:
 1. It should be noted that it is possible that the clay layer (or other low permeable strata) between the Columbia and Potomac aquifers might be absent at some locations. Because the clay layer may control the potential migration of DNAPLs, as I suggested on my comments of January 20, 1993, a contour map of the top of the clay layer should be constructed after completion of Phase I of the Remedial Investigation. This information will be very useful for Phase II investigation.
 2. As mentioned in my July 1992 and January 1993 comments, in order to collect adequate data of aquifer properties for the Feasibility Study, slug or

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pumping tests should be conducted at selected locations during Phase II of the Remedial Investigation/Feasibility Study.

2. Field Sampling Plan

A. GROUNDWATER LEVEL MEASUREMENTS

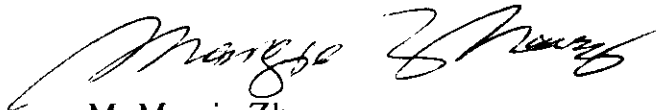
Groundwater level measurements can be taken on the same day of groundwater sampling events, except when the tidal influences are measured.

B. SAMPLING PROCEDURE

The present of NAPLs should be determined **prior to purging groundwater**. If NAPLs are present, depth and thickness of the NAPLs should be measured with an interface probe, and the NAPLs should be sampled **before the well is disturbed by purging**.

If you have any questions or wish to discuss anything further, please feel free to contact me at (302) 323-4540.

Sincerely,



M. Margie Zhang
Hydrogeologist
Superfund Branch

pc: Peter Ludzia (EPA)
N. V. Raman (DNREC)
Stephen N. Williams (DNREC)

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